

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

No. 24-cv-06563-LJL

RUDOLPH W. GIULIANI,

Defendant.

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN
IN SUPPORT OF PLAINTIFFS' MOTION TO HOLD
DEFENDANT IN CIVIL CONTEMPT AND TO IMPOSE SANCTIONS**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this Court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.
2. I submit this declaration in support of Plaintiffs' Motion to Hold Defendant Rudolph W. Giuliani in Civil Contempt and to Impose Sanctions, pursuant to Federal Rule of Civil Procedure Rule 37.
3. On August 3, 2024, Mr. Giuliani opened a bank account at Bellwether Community Credit Union ("Bellwether"), which is based in New Hampshire via a bank account opening form. A true and correct copy of the bank account opening form is attached as **Exhibit 1**.
4. On August 6, 2024, Mr. Giuliani submitted a request to Bellwether to change his address. A true and correct copy of this Bellwether personal information change statement is attached hereto as **Exhibit 2**.
5. On November 1, 2024, Plaintiffs served their first requests for production (the "First RFPs") on Defendant. The First RFPs seek information relevant to Mr. Giuliani's claim that he

established a homestead in Florida prior to August 8, 2024. ECF No. 93-2.

6. Despite repeated attempts to confer with Mr. Giuliani's counsel, including discussion of proposed search terms to assist in Mr. Giuliani's collection and review of responsive materials, Mr. Giuliani failed to provide any responses, objections, or a production of responsive materials by the November 15, 2024 deadline. *See* ECF No. 93.

7. On November 3, 2024, Mr. Giuliani served Plaintiffs his initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). Plaintiffs have modified the formatting of Mr. Giuliani's initial disclosures to add in spaces, which were deleted in the document served. The substance of these disclosures has not been altered in any way. A true and correct copy of Mr. Giuliani's initial disclosures, both the original and modified as described, are attached as **Exhibit 3**.

8. Mr. Giuliani failed to file any opposition or response to Plaintiffs' Motion to Compel by the November 20, 2024 deadline.

9. On November 6, 2024, Plaintiffs served on Mr. Giuliani their first set of interrogatories (the "First Set of Interrogatories"). Plaintiffs also served on Mr. Giuliani their first set of Local Rule 33.3(c) Contention Interrogatories (the "First Set of Contention Interrogatories") that same day.

10. On December 2, 2024, Mr. Giuliani returned responses to Plaintiffs' First Set of Interrogatories and Plaintiff's First Set of Contention Interrogatories. A true and correct copy of Mr. Giuliani's response to Plaintiffs' First Set of Interrogatories and First Set of Contention Interrogatories is attached as **Exhibit 4**.

11. As of the date of this filing, Mr. Giuliani has not produced any documents to Plaintiffs, including those on which he intends to rely. Mr. Giuliani also has not served responses and objections to the First RFPs.

12. On November 26, 2024, this Court held a hearing on the request for substitution of counsel and for an extension of existing deadlines. ECF No. 92. A true and correct copy of the transcript from that hearing is attached as **Exhibit 5**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 5, 2024.

s/ M. Annie Houghton-Larsen
M. Annie Houghton-Larsen
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
(212) 728-8000
mhoughton-larsen@willkie.com

*Attorney for Ruby Freeman and
Wandrea' Moss*